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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 IN RE: UBER TECHNOLOGIES, INC.
12 PASSENGER SEXUAL ASSAULT
13 LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

14 This Document Relates to:

15 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,
16 CV-25-4276-PHX-CRB

**DECLARATION OF MAYA R. KALONIA IN
SUPPORT OF PLAINTIFF JAYLYNN
DEAN'S STATEMENT IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTIONS TO SEAL [ECF NOS. 4355, 4377]**

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18 I, Maya R. Kalonia, declare:

19 1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the
20 above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to
21 practice before this Court. I make this declaration based on my own personal knowledge. If called upon to
22 testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit
23 this declaration in support of Plaintiff Jaylynn Dean's Statement in Support of Defendants'
24 Administrative Motions to Seal ("Plaintiff's Statement"), ECF Nos. 4355, 4377.

25 2. I have reviewed Defendants' Motion for Partial Summary Judgment ("Motion") that was
26 filed at ECF 4379.

27 3. I have reviewed the Declaration of Jonathan Schneller in Support of Defendants' Motion
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1 for Partial Summary Judgment that was filed at ECF 4379-1.

2 4. I have reviewed Exhibit 8 to Defendants' Motion for Partial Summary Judgment that was
3 filed at ECF 4377-5.

4 5. I have reviewed Exhibit 9 to Defendants' Motion for Partial Summary Judgment that was
5 filed at ECF 4377-6.

6 6. I have reviewed Exhibit 10 to Defendants' Motion for Partial Summary Judgment that was
7 filed at ECF 4377-7.

8 7. I have reviewed Exhibit 21 to Defendants' Motion for Partial Summary Judgment that was
9 filed at ECF 4377-9.

10 8. The Motion includes the name of third-party SM.

11 9. The Declaration includes the name of third-party SM.

12 10. Exhibit 8 includes the name and address of third-party SM, in addition to details of SM's
13 private life, and Plaintiff Jaylynn Dean's medical information.

14 11. Exhibit 9 includes the name of third-party SM and details of SM's private life.

15 12. Exhibit 10 includes the name of third parties SM and JW. It also includes the address of SM,
16 the details of SM's private life, and Plaintiff Jaylynn Dean's medical information.

17 13. Exhibit 21 includes the names of Wave 1 Bellwether Plaintiffs LCHB128, B.L., A.R.2, and
18 WHB 832. These Plaintiffs wish to continue proceeding anonymously under their pseudonyms.

19 14. On information and belief, SM's address, contained in Exhibits 8 and 10, is not publicly
20 available.

21 15. The significant privacy concerns of Plaintiffs and third parties outweigh any minimal public
22 interest in disclosure of their identities or highly sensitive information. The public's interest in the case may
23 be satisfied without revealing this information.

24 16. The highly sensitive medical information of Jaylynn Dean and the personal information
25 regarding SM's private life typify the type of information that may be used by a third party to gratify
26 private spite, promote scandal, or circulate libel.

27 17. The disclosure of personally identifiable and highly sensitive private information would
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1 harm Wave 1 Bellwether Plaintiffs Jaylynn Dean, LCHB128, B.L., A.R.2, and WHB 832, and third parties'
2 legitimate privacy interests. Plaintiffs' request is narrowly tailored to sealing only PII and sensitive personal
3 information. There is no less restrictive alternative to sealing that would protect the legitimate privacy
4 interests of Plaintiffs and third parties, as describing the information would reveal its contents.

5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed on November 24, 2025 in Oakland, California.

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8 /s/ Maya Kalonia

9 Maya Kalonia
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